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5 *Attorneys for Defendants JE Dunn Construction  
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and Travelers Casualty and Surety Company*

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9 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA, for the use  
11 and benefit of SUSTAINABLE MODULAR  
MANAGEMENT, INC., a Texas corporation,

12 Plaintiff,

13 vs.

14 JE DUNN CONSTRUCTION  
15 COMPANY; FEDERAL INSURANCE  
COMPANY; HARTFORD FIRE  
16 INSURANCE COMPANY; TRAVELERS  
CASUALTY AND SURETY COMPANY  
17 OF AMERICA; DOE Individuals I-X and  
ROE Entities I-X, inclusive,

18 Defendants.

19 Case No.: 2:20-cv-00790-JAD-NJK

20 Compl. Filed: May 1, 2020

21 **STIPULATION TO EXTEND  
ALL DEFENDANTS' TIME TO  
RESPOND TO COMPLAINT**

22 **(THIRD REQUEST)**

23 This Stipulation to Extend all Defendants' Time to Respond to Complaint is made  
24 by and between Plaintiff United States of America, for the use and benefit of Sustainable  
Modular Management, Inc. ("Plaintiff") and Defendants JE Dunn Construction Company,  
Hartford Fire Insurance Company, and Travelers Casualty and Surety Company of  
America ("Defendants") through their respective counsel, in light of the following facts:

25 **RECITALS**

26 A. Plaintiff filed the Complaint ("Complaint") on or about May 1, 2020.

1           B. Pursuant to the second Stipulation and Order to Extend All Defendants'  
2 Time to Respond to Complaint, the current deadline for all defendants to respond to the  
3 Complaint is June 26, 2020.

4           C. With the exception of Defendant Federal Insurance Company, all  
5 defendants have been served.

6           D. Through an agreement with Plaintiff and Federal Insurance Company,  
7 counsel for Defendants will be authorized to accept service on behalf of Federal Insurance  
8 Company.

9           E. To allow time to coordinate the acceptance of service, and to allow all  
10 defendants to provide a single response to Plaintiff's Complaint, the parties agreed that all  
11 defendants shall have until Wednesday, July 1, 2020, to respond to the Complaint.

12          F. There is good cause to grant this stipulation because the extension avoids  
13 the necessity of filing multiple responses to the Complaint, and the associated costs.

14          G. This stipulation is filed in good faith and not intended to cause delay.

15          H. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request  
16 that the Court extend all defendants' time to respond to Plaintiff's Complaint through July  
17 1, 2020.

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## **STIPULATION**

NOW, THEREFORE, Plaintiff and Defendants hereby stipulate and agree that all defendants have up to and including July 1, 2020, to file a response to Plaintiff's Complaint.

## IT IS SO STIPULATED.

DATED this 26<sup>th</sup> day of June, 2020.

DATED this 26<sup>th</sup> day of June, 2020.

## MORRIS LAW GROUP

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## ORDER

IT IS SO ORDERED.

## United States Magistrate Judge

DATED June 29, 2020